

NEAM Limited (“NEAM” or the “Firm”) is committed to acting ethically and with integrity in all of its business relationships and to ensuring that its business and supply chains, such as they are, are free from modern slavery and human trafficking.

NEAM Structure, Business & Supply Chains

NEAM provides asset management services primarily to insurance company clients on a separately managed account basis with a focus on core fixed income. Generally, our client’s goals and objectives focus on maximising the financial return on invested assets within certain risk parameters. NEAM’s key suppliers are firms providing professional services to support NEAM’s client-facing activities as well as various other suppliers providing other services to support NEAM’s operations. These suppliers include professional services firms, data vendors, software and other service providers with respect to NEAM’s IT infrastructure and operational requirements, information and data technology specialists and other services businesses that specialize in servicing asset managers.

Policies & Standards

Code of Ethics

NEAM’s Code of Ethics explains the manner in which NEAM behaves as an organization and how it expects its employees to act and supplements and amplifies NEAM’s other Policies (defined below). NEAM is committed to conducting its business by adhering to our CORE Values at all times:

NEAM’s C.O.R.E Values

*At NEAM, **Character** is our foundation. We strive to act with integrity, honesty, fairness, and transparency. In a spirit of **Openness**, we operate in an inclusive team-based environment, valuing the diversity, talents, and contributions of all employees. We **Respect** each other, our views, and perspectives. We cultivate our most valuable resource, our people, promoting **Equity** of opportunity to succeed. By working together and holding ourselves to intellectual rigor and excellence, we aim to deliver the results that our clients demand and deserve.*

Other Policies

NEAM has a number of internal personnel and compliance policies, procedures, guidelines and standards (collectively, “Policies”) in place that explain the manner in which NEAM behaves as an organization and how it expects its employees and suppliers to act. NEAM has designed and implemented these Policies to ensure that its business is conducted in an ethical and transparent manner and in accordance with all applicable laws and regulatory requirements. The Policies address issues, including, without limitation, relating to:

- Anti-money laundering
- Bribery and corruption
- Confidentiality/privacy/information security
- Conflicts of interest
- Fiduciary obligations
- Hiring and employment practices
- Regulatory compliance
- Sanctions
- Standards of business conduct; and
- Supplier due diligence and selection
- Whistleblowing

NEAM's whistleblowing policy encourages employees to report concerns they may have about how colleagues are being treated or practices within NEAM's business or supply chain (including concerns regarding compliance with applicable laws and/or breaches of NEAM's ethical standards). The whistleblowing policy would also cover any circumstances that may give rise to an enhanced risk of slavery or human trafficking. NEAM's whistleblowing policy is designed to make it easy for its employees to make disclosures, without fear of retaliation and permits employees to anonymously report incidents via an anonymous reporting hotline, where legally permissible.

Due Diligence & Risk Assessment With Respect to Employees

Through its selection, recruitment, induction and training procedures and programs, NEAM aims to ensure that the people it employs are not subject to modern slavery and human trafficking and are afforded the rights and protections that they are entitled to by law.

Investment Management

NEAM is a signatory to the Principles for Responsible Investment ("PRI"), a voluntary framework for incorporating environmental, social and governance issues into investment decision-making and ownership practices.

Supply Chains

NEAM conducts (a) initial due diligence on its material suppliers using a risk-based approach, and (b) ongoing due diligence, as it deems appropriate, on its suppliers based on the current risk assessment.

Risk Assessment

We believe that NEAM faces a low risk of slavery and human trafficking in its supply chains because NEAM uses mainly low risk professional suppliers, and NEAM does not (a) act as a producer, manufacturer or retailer of any physical goods, (b) have intricate supply chains or (c) obtain material services from external businesses located in high risk countries.

Effectiveness of Anti-Slavery and Human Trafficking Efforts

NEAM is committed to periodic review of its supply chain risk management processes and identifying areas which may pose a higher risk of slavery and human trafficking, and adopting appropriate governance processes.

Training

All NEAM employees are required to read and acknowledge the NEAM Code of Ethics and receive training on various policies on a periodic basis.